

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CENTURY INDEMNITY COMPANY, ACE
INA INSURANCE, ACE AMERICAN
INSURANCE COMPANY and ACE
PROPERTY AND CASUALTY INSURANCE
COMPANY,

Petitioners,

v.

AXA BELGIUM (F/K/A ROYAL BELGE
INCENDIE REASSURANCE),

Respondent.

1:11-cv-07263-RJH
(ECF CASE)

NOTICE OF MOTION TO SEAL


To: The Clerk of Court and all Parties of Record:

PLEASE TAKE NOTICE, that AXA Belgium (f/k/a Royal Belge Incendie Reassurance) (“AXA”), will move the Honorable Richard J. Holwell, at the Courthouse located at 500 Pearl Street, New York, New York 10007, for an Order directing that Exhibits “10” through “19” annexed to AXA’s Answer to Petition to Confirm Arbitration Awards and Cross Petition to Vacate Arbitration Awards be filed under seal, and that unredacted versions of AXA’s Answer/Cross Petition and Memorandum of Law be filed under seal.

PLEASE TAKE FURTHER NOTICE, that AXA will rely upon the accompanying Declaration of Michael S. Gollub and Memorandum of Law, both dated December 6, 2011, and proposed form of Order e-mailed to the Orders and Judgments Clerk at judgments@nysd.uscourts.gov.

Dated: December 5, 2011
New York, New York

Respectfully submitted,
MARSHALL, CONWAY & BRADLEY, P.C.

A handwritten signature in black ink, appearing to read "Michael Gollub", written over a horizontal line.

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